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14 *Attorneys for Plaintiff, Justin Cody Harper*

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16 **UNITED STATES DISTRICT COURT**  
17 **CENTRAL DISTRICT OF CALIFORNIA**

18  
19 JUSTIN CODY HARPER,

Case No. 5:23-cv-00695-SSS-DTB

20 Plaintiff,

Assigned to:

21 vs.

Hon. District Judge Sunshine S. Sykes  
Hon. Mag. Judge David T. Bristow

22 CITY OF REDLANDS, REDLANDS  
23 POLICE DEPARTMENT, POLICE  
OFFICER KOAHU, AND DOES 1-  
24 10, INCLUSIVE,

**JOINT STIPULATION AND  
REQUEST TO CONTINUE THE  
PRETRIAL FILING DEADLINES**

25 Defendants.

26 COME NOW Plaintiff Justin Harper and Defendants City of Redlands and Nicholas  
27 Koahu and hereby stipulate and request as follows:  
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- 1     1. On February 12 and 13, 2025, counsel for Defendants and counsel for  
2         Plaintiff met and conferred regarding the upcoming pretrial filings, including  
3         the Parties' motions in limine. During the meet and confer, counsel discussed  
4         their upcoming trial schedules and Defendants' pending Motion for Summary  
5         Judgment.
- 6     2. Currently, Defendants' Motion for Summary Judgment is set to be heard on  
7         February 28, 2025.
- 8     3. The Parties submit that GOOD CAUSE exists to modify the pretrial filing  
9         schedule, as follows:
  - 10         a. Plaintiffs' counsel, Dale K. Galipo and Renee V. Masongsong, will be  
11             engaged in trial beginning February 18, 2025, in the case *Lennox v.*  
12             *State of California, et al.*, Case No. 2:21-cv-02075-DAD-KJN. This  
13             case is in the Eastern District of California in front of Judge Dale  
14             Drozd.
  - 15         b. Defendants' counsel, James Touchstone, will be engaged in trial  
16             beginning on February 24, 2025, in *Estate of Escobedo v. City of Los*  
17             *Angeles, et al.*, Los Angeles Superior Court Case No. 19STCV43741 in  
18             Department 72 before Judge Joseph Lipner.
- 19     4. Additionally, the Parties noticed that two trials are scheduled to take place in  
20         front of this Court starting on April 21, 2025—the above-captioned case  
21         (*Harper*) and *Nunez v. County of San Bernardino*, Case No. 5:22-cv-01934-  
22         SSS-SPx. The Parties are not opposed to continuing the *Harper* trial if the  
23         *Nunez* trial goes forward as scheduled.
- 24     5. THEREFORE, the Parties jointly request that this Court modify the pretrial  
25         filing schedule as follows:

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27             //

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Event	Current Date	Proposed Date
Last Day to File Motions in Limine	2/21/25	3/7/25
Last Day to Exchange Proposed Jury Instructions	2/28/25	3/14/25
Last Day to Exchange Objections to Jury Instructions; Last Day to File MCFL, Witness Lists, Joint Exhibit List, Joint Status Report re Settlement, and Oppositions to Motions in Limine	3/7/25	3/21/25
Last Day to File Joint PPTCO, Jury Instructions, Verdict Forms, Statement of the Case	3/21/25	No change
Hearing on Motions in Limine	3/28/25	4/4/25

IT IS SO STIPULATED.

DATED: February 13, 2025

LAW OFFICES OF DALE K. GALIPO

By: /s/ Dale K. Galipo  
Dale K. Galipo  
Renee V. Masongsong  
Attorney for Plaintiff

1 DATED: February 13, 2025

JONES MAYER LAW

2 By: /s/ Scott Wm. Davenport  
3 Scott Wm. Davenport  
4 Attorney for Defendants

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